

Hearing Date and Time: August 14, 2012 at 10:00 AM
Objection Deadline: August 7, 2012

FORMAN HOLT ELIADES
RAVIN & YOUNGMAN
80 Route 4 East, Suite 290
Paramus, New Jersey 07652
201-845-1000
Michael E. Holt
Mholt@formanlaw.com

Counsel for Hitoshi & Wakana Inoue

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	
	:	Chapter 11
RESIDENTIAL CAPITAL LLC, et. al.	:	
	:	Case No. 12-12020 (MG)
Debtors	:	
	:	(Jointly Administered)
	:	

**NOTICE OF MOTION OF HITOSHI & WAKANA INOUE FOR
ORDER PURSUANT TO SECTION 362(d) OF THE BANKRUPTCY
CODE MODIFYING THE AUTOMATIC STAY TO PERMIT
MOVANTS TO PROCEED TO TRIAL BEFORE CALIFORNIA SUPERIOR COURT
AND TO EXTEND TIME TO OBJECT TO DISCHARGE**

TO THE PARTIES OF THE ATTACHED SERVICE LIST:

PLEASE TAKE NOTICE, that Hitoshi Inoue and Wakana Inoue ("Movants"), by their attorneys Forman Holt Eliades Ravin & Youngman, LLC, shall move before the Honorable Martin Glenn, United States Bankruptcy Judge in the Courtroom located at the United States Bankruptcy Court for the Southern District of New York, located at U.S. Customs Building, 1 Bowling Green, Courtroom 501, New York, New York 10004-1408 on August 14, 2012 at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order pursuant to 11 U.S.C. Section 362(d), modifying the automatic stay imposed by 11 U.S.C. Section 362(a) to permit Movants to proceed to trial in the matter of *Inoue v. GMCAC*, SCV 248256, before the Superior Court

California, County of Sonoma and seeking an extension of time to object to discharge pursuant to Federal Rule of Bankruptcy Procedure 4004(b).

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief herein requested shall be in writing, shall state with particularity the grounds for objection, shall be filed with the Clerk of the Bankruptcy Court and served upon, the undersigned counsel for the Applicant by 4:00 p.m., (New York City time) on the date that is seven days prior to the return date and upon those persons required by the *Order Establishing Certain Notice, Case Management and Administrative Procedures*. (Docket No. 141.)

FORMAN HOLT ELIADES
RAVIN & YOUNGMAN, LLC
Attorneys for Hitoshi Inoue and Wakana Inoue

By: /s/ Michael E. Holt
Michael E. Holt

Dated: July 16, 2012